

DEPARTMENT OF AGRICULTURE

ANIMAL PLANT HEALTH INSPECTION SERVICE

Docket No. 05-015-1

National Animal Identification System

Notice of Availability of a:

Draft Strategic Plan and Program Standards

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My name is Stu Marsh. I represent Farnam Companies, Inc, a tag manufacturer headquartered in Phoenix, Arizona.. I appreciate the opportunity to submit comments regarding the National Animal Identification System (NAIS) Draft Strategic Plan and Program Standards.

I support the overall objectives of the NAIS and the Program Standards to:

- ☐ Establish a uniform national standard for uniquely identifying locations that produce, manage, and hold livestock.
- ☐ Establish a uniform national standard for uniquely identifying individual animals and a group or lot of animals as they move through the marketing chain.
- ☐ Establish a uniform national standard data management system for recording the movements of individual and lots of animals at change of ownership, interstate movement, and commingling with other owners livestock.
- ☐ Establish the ability to trace a diseased animal of concern from point of diagnosis through the marketing chain to herd of origin within 48 hours.

I support the five guiding principles of the Draft Strategic Plan and the Program standards establishing:

- ☐ Uniform data standards throughout the U.S. supporting premises registration, animal identification, and animal tracking.
- ☐ Coordination of NAIS with production management systems and marketing incentives.
- ☐ Mandated implementation for all livestock species.
- ☐ Cooperative efforts by industry and government to achieve 48 traceback.
- ☐ Secured, reliable and confidential information.

TOPICS OF SPECIAL INTEREST:

Technology Neutral:

I strongly support the NAIS Cattle Industry Working Group calling for the individual identification of all cattle, utilizing ISO-compliant Radio Frequency Identification Device (RFID) ear tags as the standard for implementing the NAIS in the U.S. cattle industry. While technology neutral may be a favored politically correct position, *it provides no leadership, guidance or incentive in the market place* for infrastructure development. Technology neutral dictates that producers, marketing agents and packing plant managers must have all forms of ID equipment available just in case an animal shows up with a varying type of ID device. Technology neutral only adds expense not effectiveness to the program.

To maintain continuity of animal disease programs and reporting animal tracking data to the NAIS, I support the use of RFID technology in all livestock species as deemed effective and appropriate by the NAIS Specie Working Groups.

Making the NAIS Mandatory by January, 2009:

I encourage USDA to step-up the timetable for implementation by requiring premises registration and animal identification at herds / flocks of origin by January 1, 2007. Identification at origin provides a necessary “bookend” for disease traceability. The other “bookend” comes at the time of disease detection either at ante mortem or post-mortem inspection at harvest or other production location. Placement of the “bookends” into the NAIS as an initial first step can be accomplished in a short period of time at less expense to industry and government compared to the proposed NAIS initiative to report all changes of ownership that may occur between the bookends. While the “bookend” step may not always meet the 48 hour traceback goal, it will significantly improve the current disease traceability timetable in the U.S. and be reflective of other animal identification systems accepted by international trading partners.

I support the NAIS objective to report to a national database all changes of ownership, interstate movements, and commingling of multiple owners livestock as the second step in reaching the overall objectives and goal of the NAIS. The construction time and expense of the electronic data recording infrastructure throughout the marketing chain, pushes an NAIS start-up date to 2009. Implementing an initial bookend step enables us to improve traceability and establish a recognized identification system by 2007. In the meantime we can further research and develop improved ID devices, scanners and data transfer capabilities in livestock work environments that will more effectively perform and accurately transfer movement data generated between the bookends to the NAIS by 2009.

I support making the NAIS mandatory. Recently it has been demonstrated numerous times that one diseased animal or small flock can have tremendous negative impact on the health status of a state and nation and the national and international market place. Given this scenario, it is imperative that each producer, if he has one animal or thousands, must realize the responsibility he has to protect the health of the livestock industry. Given human nature, some people will not participate in the program until they have too.

A mandatory program requires that a time-tested infrastructure to support the program is in place. I question that, given the current level of state and federal funding, if a mandate can be met by 2009. Therefore, I encourage APHIS to seek additional, adequate federal funding to support technology and infrastructure development.

Tagging site options:

I support entrepreneurial opportunities for establishing official tagging sites and / or mobile services. Both private individuals and livestock auction managers should have the opportunity to provide these services. The open market will determine success.

Achieving compliance with identification and movement reporting requirements:

I support the general concept that the receiving premises is the entity ultimately responsible for reporting the movement. State-licensed livestock dealers can be forced to report movements as a condition of the license and proclaimed through State UM&R. In the case of direct or private treaty sales, ***both the seller and the buyer should be encouraged to report the movement.*** This self-policing cross check will ensure for the seller and the buyer, that health authorities would have access to the official record noting the day their respective responsibility stopped / started. The NAIS Animal Tracking System should accommodate the listing of name and address, since in most cases the buyer and seller would not share premises numbers.

The most efficient method of reporting will be to establish a web-based system that allows industry segments to directly report on-line. Still others who do not have web access or chose not to utilize electronic record keeping and communications (such as Amish producers and Amish owned auction markets) will need to have access to paper-trail disclosures of movement. These paper-trail forms can be generated by the state and proclaimed through State UM&R, but a national standard format would prove helpful in ensuring data entry success. Producer access to reporting forms could be made available through local vet, extension, FSA, producer organizations and sale barn offices.

When to identify animals:

I support the basic requirements for identifying animals at change of ownership, interstate movements, and commingling of animals by multiple owners. I believe these requirements are easier to monitor and provide sufficient data to enhance a timely traceback. Especially compared to the movement data we have access to today. APHIS should avoid establishing requirements it can not police. How are you going to verify the “time” the animal was identified or the “age” of the animal when identified, without being there to witness the act and the birth of the animal?

Specie timelines for implementation:

I realize the NAIS was based on a “worse-case” scenario of a foot & mouth disease outbreak. Knowing the specie relationship between *swine, sheep & goats, and cattle* in the replication, transfer and expression of the disease; ***I believe that NAIS implementation for these three species should move forward as-soon-as-possible.*** Given that the other major uses of APHIS resources in recent years has been avian influenza and new castle disease outbreaks in poultry, vesicular stomatitis in horses, and TB and chronic wasting disease in farmed deer and elk; I suggest that these species be identified as second priority followed by llama & alpaca, bison and aquaculture.

Cost- effective and efficient methods for submitting data:

I encourage the direct electronic transfer of as much data as possible. I support and encourage producers, markets, abattoirs, breed associations, and third-party data managers have the ability to submit animal movement data to the animal tracking system. I realize there will be a continuing need for paper-trail submissions that state office staff will have to enter into the system. However, paper-trail submissions represent the most costly and inaccurate method of data entry.

Confidentiality of data:

I believe that all ***information contained in the NAIS should be protected from disclosure.*** The sole purpose of the NAIS is to enhance the U.S. disease surveillance and monitoring system. The animal-tracking component promises to provide animal health authorities the opportunity to significantly improve plans to prevent and control disease outbreaks. The same data set given access to the public could be used to significantly improve plans to start a disease outbreak.

Minimizing the steps to reporting information:

I support the general concept that the receiving premises is the entity ultimately responsible for reporting the movement.

The database supporting the reporting of animal movements should be electronically based and centralized in structure. The reporting of animal movement information (premises of origin, premises of destination, animal identification, and the date of transaction / movement) should be state controlled and coordinated through the proposed NAIS Animal Tracking System. Such a system will provide large and small producers an easy one step, cost effective choice in meeting the reporting requirements of the NAIS. In order for the state / federal veterinary infrastructure to respond to an animal disease outbreak or threat in a timely manner, the state veterinarian must be able to go to a central data system and bring up the record of all movements for the animal in question. Sale barn and meat packing plant managers at the end of the day should have the ability to access one data system and download the identification of the various individual animals and species marketed / harvested that day. .

Private data management systems:

Private data management systems are being touted as the only means for truly maintaining the confidentiality of producer data. Therefore, in order to maintain that position private data management systems must be funded with private funds.

I support the contention that private data management systems can play a role in reporting animal movements to the NAIS. The industry-led initiative that’s trying to establish a private data management system may or may not become a reality. If it becomes a reality a key question is, will existing private data management companies or other producer organization’s members agree to participate and share animal movement data? There are however, existing private data management systems that are up and running and will play a role in providing animal movement data. I anticipate that breed associations may offer an additional service to their members by providing animal movement data to the NAIS when an animal’s registration is transferred from one owner to the next. Herd record management companies will provide the same reporting service to the NAIS for their clients when animals are sold or herd / flock replacements are moved onto the farm / ranch.

I support the establishment of the proposed government controlled NAIS database for recording animal movements in and out of the state. Such a system will provide our large and small producers a cost effective choice in meeting the reporting requirements of the NAIS.

I contend that a private data management system need not include all species but it must link all separate specie databases through a central access point. In order for the state / federal veterinary infrastructure to respond to an animal disease outbreak or threat in a timely manner, the state veterinarian must be able to go to a central data system and bring up the record of all movements for the animal in question. They do not have time to query each private data management system in the country to generate an animal's record. In addition, sale barn managers at the end of the sale day should not be asked to query each private data management company in the country to try and figure out what cow, pig, sheep or goat's movement record goes to what data manager. The advantage of the proposed NAIS data management system is that it allows both individuals to go to the same system and retrieve the information desired on one animal or to submit multi-specie information.

Another continuous point made by the proponents of a privately control database is that animal movement data would only be released to state and federal animal health authorities on animals that are known to be infected with disease. This position does not recognize that all too often it is the not-appears-to-be-sick animals that spread disease. This position also disallows true-to-life preplanning exercises for disease outbreaks. Unless these positions change a privately controlled database will not meet the disease trace goal of the NAIS.

Thank you for the opportunity to submit these comments and participate in the process.